

**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL DISTRICT WITHIN
AND FOR BIG HORN COUNTY, WYOMING**

ROCKY MOUNTAIN RECOVERY SYSTEMS, INC.,)	CV-2020-0102
)	
Plaintiff,)	
)	
vs.)	
)	
KAYTLYN WILSON MARTINEZ and MATTHEW)	
MARTINEZ,)	
)	
Defendant.)	
)	
KAYTLYN WILSON MARTINEZ and MATTHEW)	
MARTINEZ,)	
)	
Counterclaimants,)	
)	
vs.)	
)	
ROCKY MOUNTAIN RECOVERY SYSTEMS INC.,)	
a Wyoming Corporation,)	
)	
Counterclaim Defendant.)	

**DEFENDANT'S/COUNTERCLAIMANTS' MOTION TO REMOVE CAUSE TO
FEDERAL DISTRICT COURT**

COME NOW Defendants/Counterclaimants, by and through their undersigned counsel and for their Motion, state:

1. Defendants/Counterclaimants have alleged a violation of the Fair Debt Collection Practices Act ("FDCPA") in their Counterclaim.

2. The FDCPA is a federal statute and as such, is a federal question for which a United States District Court has jurisdiction to address and resolve.

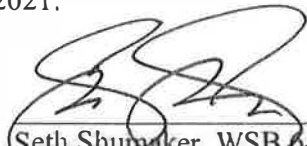
3. The FDCPA has a statute of limitations of one (1) year from the date any such violation is alleged to have occurred and as such, the Defendants wish to pursue not

only the alleged violation of the FDCPA in this matter, but to include those similarly situated.

4. A Wyoming federal district court is the most proper venue and court to address such matters raised by the Defendants/Counterclaimants in this matter.

WHEREFORE, Defendants/Counterclaimants pray an order of this Court removing this matter to federal district court and for such other and further orders as the Court deems just and appropriate.

DATED this 15th day of February, 2021.



Seth Shumaker, WSB 6-3818

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307/675-1233

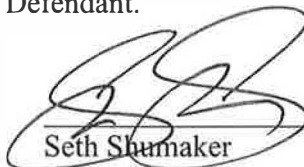
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Attorney for Defendants/Counterclaimants

certificate of service

I hereby certify that a true and exact copy of the foregoing document was sent this 15th day of February, 2021, via U.S. Mail, first class postage prepaid to Mr. Brett Allred, Attorney for the Plaintiff/Counter Defendant.



Seth Shumaker